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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

IN RE: FACEBOOK, INC. CONSUMER  
PRIVACY USER PROFILE LITIGATION,

This document relates to:  
  
ALL ACTIONS

CASE NO. 3:18-MD-02843-VC

**[PROPOSED] ORDER GRANTING  
PLAINTIFFS' ADMINISTRATIVE  
MOTION TO CONSIDER WHETHER  
ANOTHER PARTY'S MATERIALS  
SHOULD BE SEALED**

**[PROPOSED] ORDER**

The Court has considered Facebook, Inc.'s ("Facebook") Supplemental Statement in Support of Plaintiffs' Administrative Motion to Consider Whether Another Party's Materials Should Be Sealed, which proposes to redact limited portions of the following documents:

Document	Dkt. No.	Description of Portions Sought to Be Kept Under Seal
Exhibit C to Special Master's Amended Order on Plaintiffs' Motion for Additional Time to Conduct Rule 30(b)(6) Depositions.	1026-6	<ul style="list-style-type: none"><li>Limited portions that reveal confidential information regarding Facebook's proprietary data systems and data storage and processing practices. Ex. 1 at 6.</li><li>Limited portions that reveal confidential information regarding Facebook's privacy and platform policy enforcement practices. Ex. 1 at 7.</li></ul>
Exhibit A to Special Master's Second Amended Order on Plaintiffs' Motion to Compel Additional Production of Quips, Tasks, and Groups	1030-4	<ul style="list-style-type: none"><li>Limited portions that reveal confidential information regarding Facebook's proprietary data systems and data storage and processing practices. Ex. 3 at 4, 5.</li><li>Limited portions that reveal confidential information regarding Facebook's privacy and platform policy enforcement practices. Ex. 3 at 4.</li></ul>
Exhibit B to Special Master's Second Amended Order on Plaintiffs' Motion to Compel Additional Production of Quips, Tasks, and Groups	1030-5	<ul style="list-style-type: none"><li>Limited portions that reveal confidential information regarding Facebook's proprietary data systems and data storage and processing practices. Ex. 5 at 2, 7, 9, 11, 17.</li><li>Mediation discussions containing confidential and completely sensitive information. Ex. 5 at 20, 22,</li></ul>
Exhibit G to Special Master's Second Amended Order on Plaintiffs' Motion to Compel Additional Production of Quips, Tasks, and Groups	1030-10	<ul style="list-style-type: none"><li>Limited portions that reveal confidential information regarding Facebook's proprietary data systems and data storage and processing practices. Ex. 7 at i, 12–14, 20.</li><li>Limited portions that reveal confidential information regarding Facebook's tool for responding to law-enforcement requests for user records. <i>Id.</i> at i, 14–17.</li><li>Limited portions that reveal confidential information regarding ADI; the Court previously found good cause to seal similar information. <i>Id.</i> at 9–10, 31.</li><li>Limited portions that reveal confidential and competitively sensitive information regarding Facebook's business programs, strategies, decisions, and partners. <i>Id.</i> at 24, 31–32.</li></ul>
Exhibit A to Special Master's Order Regarding Facebook's Objections to 30(b)(6) Written Questions	1032-4	<ul style="list-style-type: none"><li>Limited portions that reveal confidential information regarding Facebook's proprietary data systems and data storage and processing practices. Ex. 9 at 23–25, 26–41, 60, 75–76.</li></ul>

		<ul style="list-style-type: none"> <li>• Limited portions that reveal confidential information regarding Facebook’s privacy and platform policy enforcement practices. Ex. 9 at 23, 38–41.</li> <li>• Limited portions that reveal confidential and competitively sensitive information regarding Facebook’s business programs, strategies, decisions, and partners. Ex. 9 at 43–53.</li> </ul>
Exhibit B to Special Master’s Order Regarding Facebook’s Objections to 30(b)(6) Written Questions	1032-5	<ul style="list-style-type: none"> <li>• Limited portions that reveal confidential information regarding Facebook’s proprietary data systems and data storage and processing practices. 6, 10–17, 24–39, 58.</li> <li>• Limited portions that reveal confidential information regarding Facebook’s privacy and platform policy enforcement practices. Ex. 11 at 6, 20, 24, 36–39.</li> <li>• Limited portions that reveal confidential and competitively sensitive information regarding Facebook’s business programs, strategies, decisions, and partners. Ex. 11 at 18–19, 41–51, 57.</li> </ul>

Good cause having been shown, Plaintiffs’ Administrative Motion To Consider Whether Another Party’s Materials Should Be Sealed is GRANTED. The Court hereby ORDERS:

1. The redacted versions of the following documents shall be filed on the public docket:
  - A. Exhibit C to Special Master’s Amended Order on Plaintiffs’ Motion for Additional Time to Conduct Rule 30(b)(6) Depositions, attached as Exhibit 2 to the Supplemental Falconer Declaration;
  - B. Exhibit A to Special Master’s Second Amended Order on Plaintiffs’ Motion to Compel Additional Production of Quips, Tasks, and Groups, attached as Exhibit 4 to the Supplemental Falconer Declaration;
  - C. Exhibit B to Special Master’s Second Amended Order on Plaintiffs’ Motion to Compel Additional Production of Quips, Tasks, and Groups, attached as Exhibit 6 to the Supplemental Falconer Declaration;
  - D. Exhibit G to Special Master’s Second Amended Order on Plaintiffs’ Motion to Compel Additional Production of Quips, Tasks, and Groups, attached as Exhibit 8 to the Supplemental Falconer Declaration;
  - E. Exhibit A to Special Master’s Order Regarding Facebook’s Objections to 30(b)(6) Written Questions, attached as Exhibit 10 to the Supplemental Falconer Declaration;
  - F. Exhibit B to Special Master’s Order Regarding Facebook’s Objections to 30(b)(6) Written Questions. attached as Exhibit 12 to the Supplemental Falconer Declaration;
2. The unredacted versions of the following documents shall be sealed permanently:
  - A. Exhibit C to Special Master’s Amended Order on Plaintiffs’ Motion for Additional Time to Conduct Rule 30(b)(6) Depositions, attached as Exhibit 1 to the Supplemental Falconer Declaration;
  - B. Exhibit A to Special Master’s Second Amended Order on Plaintiffs’ Motion to Compel Additional Production of Quips, Tasks, and Groups, attached as Exhibit 3 to the Supplemental Falconer Declaration;

- 1 C. Exhibit B to Special Master’s Second Amended Order on Plaintiffs’ Motion to Compel  
2 Additional Production of Quips, Tasks, and Groups, attached as Exhibit 5 to the  
3 Supplemental Falconer Declaration;  
4 D. Exhibit G to Special Master’s Second Amended Order on Plaintiffs’ Motion to Compel  
5 Additional Production of Quips, Tasks, and Groups, attached as Exhibit 7 to the  
6 Supplemental Falconer Declaration;  
7 E. Exhibit A to Special Master’s Order Regarding Facebook’s Objections to 30(b)(6)  
8 Written Questions, attached as Exhibit 9 to the Supplemental Falconer Declaration;  
9 F. Exhibit B to Special Master’s Order Regarding Facebook’s Objections to 30(b)(6)  
10 Written Questions. attached as Exhibit 11 to the Supplemental Falconer Declaration;

11 **IT IS SO ORDERED.**

12 DATE: \_\_\_\_\_

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14 VINCE CHHABRIA  
15 United States District Judge  
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